

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDWARD ROBERT LICHWICK, JR.,

Plaintiff,

– against –

VERIZON,

Defendant.

Civil Action No.: 08-CIV-3892 (SCR)

ECF CASE

**DECLARATION OF VERONICA C. GLENNON
IN FURTHER SUPPORT OF DEFENDANT'S MOTION TO DISMISS**

I, Veronica C. Glennon, declare, pursuant to 28 U.S.C. §1746 and under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I submit this declaration in further support of Verizon PA's motion to dismiss the Complaint in the above-captioned matter.
2. I am currently employed by Verizon Corporate Services Corp. as Manager, Corporate Governance, and I have held this position since 2004. In this position, I am responsible for addressing corporate governance issues concerning various corporate affiliates and entities including Verizon Pennsylvania Inc. ("Verizon PA").
3. Verizon PA is a wholly-owned subsidiary of Verizon Communications Inc. ("VCI"), a Delaware corporation that is headquartered in New York.
4. Verizon PA is a local telephone company that primarily provides local, exchange access, intrastate and interstate toll telephone services, and data/video services via FiOS to customers within Pennsylvania.

5. Verizon PA has its own separate officers and directors, although some of its officers also may be officers of, and some of its directors also may be directors of, VCI.

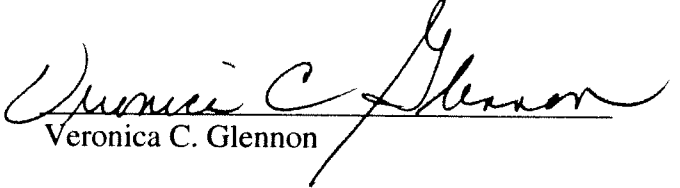
6. I am an officer of, and the Assistant Secretary for, Verizon PA.

7. Verizon PA is incorporated in Pennsylvania with a principal business address of 1717 Arch Street, Philadelphia, PA 19103.

8. Verizon PA is qualified or registered to do business in Pennsylvania. Verizon PA is not qualified or registered to do business in New York.

9. Verizon PA has its own employees, who are not employees of VCI.

Dated: August 21, 2008


Veronica C. Glennon

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2008, the foregoing was filed with the Clerk of the Court and served via overnight delivery in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon:

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